

LAW OFFICE OF GARY GREENBERG, ESQ.

*666 Third Avenue, 10th Floor
New York, New York 10017*

Phone: 212-765-5770
E-mail: gg@ggreenberglaw.com

January 14, 2022

By ECF

The Honorable Stewart D. Aaron
United States District Court
for the Southern District of New York
500 Pearl Street, Room 1970
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup Inc., et al.,
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Aaron:

The Parties submit this joint letter to request a modification of Paragraph 1 of the November 27, 2021 Discovery Order (ECF Document # 57) which currently requires substantial completion of document discovery by January 21, 2022. Counsel seek to extend the substantial completion date for document discovery to February 11, 2022. No modification to Paragraph 2 (completion of fact discovery) or Paragraph 3 (completion of all discovery) is sought at this time.

The Parties have met and conferred a number of times (most recently on January 4, 10 and 14, 2022) in attempts to resolve outstanding discovery disputes. We have made substantial progress in resolving those disputes and will continue to meet and confer in further attempts to resolve the remaining issues, in the hope that we will not have to burden the Court or, if we do, any disputes will be reduced to a minimum.

Law Office of Gary Greenberg, Esq.

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Respectfully submitted,

LAW OFFICE OF GARY GREENBERG, ESQ.

By: 
Gary Greenberg
666 Third Avenue, 10th Floor
New York, New York 10017
Telephone: (212)-765-5770
gg@greenberglaw.com

LAW OFFICE OF DAVID R. LURIE, PLLC
194 President Street
Brooklyn, New York 11231
Telephone: (347) 651-0194
david@davidlurielaw.com

Counsel for Plaintiff

GOODWIN PROCTER LLP

By: s/
Marshall H. Fishman
Samuel J. Rubin
William J. Harrington
Allison M. Funk
The New York Times Building
620 Eighth Avenue
New York, NY 10018
Telephone: (212) 813-8800
Facsimile: (212) 355-3333
mfishman@goodwinlaw.com
srubin@goodwinlaw.com
wharrington@goodwinlaw.com
afunk@goodwinlaw.com
Counsel for Defendants